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NAUTILUS INSURANCE COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBERT "SONNY" WOOD, an individual;
ACCESS MEDICAL, LLC, a Delaware limited
liability company,

Plaintiffs,

v.

NAUTILUS INSURANCE GROUP, a
Delaware limited liability company, et al.,

Defendant.

NAUTILUS INSURANCE COMPANY,

Cross-Claimant,

v.

ROBERT "SONNY" WOOD; ACCESS
MEDICAL, LLC; FLOURNOY
MANAGEMENT, LLC AND ROES 1-10,
inclusive,

Counter-Defendants.

Case No. 2:17-CV-02393-MMD-DJA

STIPULATION AND ORDER
FOR EXTENSION (FOURTH REQUEST) OF
DEADLINES TO MOVE FOR FEES AND
COSTS FROM NAUTILUS'S DISCOVERY
MOTIONS HEARD ON FEBRUARY 20, 2020

1 The parties hereto, by and through their undersigned counsel, stipulate for an extension of
2 the deadline associated with Defendant Nautilus Insurance Company's ("Nautilus's") Request for
3 Sanctions arising out of its Motion to Quash the Subpoena to the Cutler Law Firm, ECF No. 168
4 and its Motion for a Protective Order, ECF No. 184 (collectively "the Motions").

5 In the hearing on the Motions on February 20, the Court permitted Nautilus to file a motion
6 to recover fees and costs related to the Motions within 14 days. The Court also required that the
7 parties meet and confer on the fees and costs issue and amounts prior to Nautilus filing the motion.

8 The parties are making progress in the meet and confer process, but have not yet reached
9 an agreement or an impasse. However, because of some last-minute delays relating to the
10 COVID-19 virus, the parties have been unable to complete their meet and confer. In light of that,
11 and due to the current ongoing meet and confer communications, the parties request that the Court
12 order:

- 13 1. Nautilus's motion for fees and costs, if necessary, is currently due on April 16, 2020
14 but that deadline is continued to April 30, 2020.
- 15 2. Access and Wood's opposition, if necessary, is currently due on April 30, 2020, but
16 that deadline is continued to May 14, 2020.
- 17 3. Nautilus's reply, if any, is currently due May 7, 2020 but that deadline is continued to
18 May 14, 2020.

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1 **IT IS SO STIPULATED.**

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3 DATED: April 16, 2020

SELMAN BREITMAN LLP

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5 By: /s/ Linda Wendell Hsu

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16 Attorneys for Defendant/Cross-Claimant
17 NAUTILUS INSURANCE COMPANY

18
19 DATED: April 16, 2020

KRAVITZ, SCHNITZER & JOHNSON, CHTD

20
21 By: /s/ Jordan P. Schnitzer

22 JORDAN P. SCHNITZER
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24 THE SCHNITZER LAW FIRM
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Attorneys for Defendants ACCESS MEDICAL,
LLC and ROBERT CLARK WOOD, II

IT IS SO ORDERED:

Dated: April 17, 2020


Magistrate Judge Daniel J. Albregts

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of SELMAN BREITMAN LLP and, pursuant to Local Rule 5.1, service of the foregoing **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION (FOURTH REQUEST) OF DEADLINES TO MOVE FOR FEES AND COSTS FROM NAUTILUS'S DISCOVERY MOTIONS HEARD ON FEBRUARY 20, 2020** on this 16th day of April, 2020, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list, as follows:

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/s/ Pamela Smith
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